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Attorneys for Defendant Apple Inc.

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

In re Apple iPhone Antitrust Litigation

CASE NOS. 4:11-cv-06714-YGR
4:19-cv-03074-YGR

**DECLARATION OF MARK ROLLINS IN
SUPPORT OF APPLE INC.'S *DAUBERT*
MOTIONS & BRIEFS IN OPPOSITION TO
CLASS CERTIFICATION**

The Honorable Yvonne Gonzalez Rogers

Date: Nov. 16, 2021
Time: 10:00 a.m.
Courtroom: 1, 4th Floor

PUBLIC REDACTED VERSION

1 Pursuant to Civil Local Rule 7-5, I, Mark Rollins, declare as follows:

2 1. I am employed as a Finance Manager at Apple Inc. (“Apple”) and, among other duties,
3 work with the teams of engineers responsible for all of Apple’s identity and access management. I
4 have personal knowledge of the facts stated below and, if called as a witness, I could and would testify
5 competently thereto. I submit this declaration in support of Defendant Apple Inc.’s *Daubert* Motions
6 and Oppositions to Class Certification.

7 2. People or entities use and make purchases on the App Store through “Apple IDs,” which
8 are unique, password-protected accounts. To obtain an Apple ID, a person or entity provides a first
9 and last name, email address, birthdate, and telephone number of their choosing. Only one email
10 address, birthdate, and telephone number are required to obtain an Apple ID; users are not required to
11 provide or list all of their email addresses and/or telephone numbers to obtain an Apple ID. The
12 provided email address becomes the Apple ID identifier. Apple does not require other identifying
13 information—such as confirmation of a legal name, confirmation of a legal birthdate, or a mailing
14 address—to obtain an Apple ID.

15 3. People or entities obtain multiple Apple IDs to use the App Store—for example, using
16 different email addresses and phone numbers of their choosing. Such accounts need not be “linked”
17 together by the user, nor, again, is a user required to provide a list of all of their email addresses,
18 telephone numbers, or other required information for a given Apple ID.

19 4. Payment methods for purchases from the App Store can include but are not limited to
20 credit cards and gift cards, which can be “linked” to a person’s or entity’s Apple ID(s). A person or
21 entity can use or “link” different payment methods for different Apple ID accounts, can use or “link”
22 multiple payment methods to a single Apple ID account, and use or “link” different payment methods
23 to an Apple ID account over different time periods. A person or entity is not required to provide a list
24 of all of their credit cards or possible payment methods for a given Apple ID. Apple does not identify
25 or validate payment methods across Apple IDs to establish that they belong to the same person or
26 entity. A person or entity may enter or use a payment method, like a credit card, by verifying numbers
27 and other security information. Apple does not own third-party information related to, for example,
28 credit cards, so Apple does not have a way to validate ownership of a particular method of payment.

1 5. Because the information a person or entity provides to obtain an Apple ID is self-
2 reported and can differ as set forth in Paragraphs 2-4, above, Apple does not have the ability to establish
3 or verify each or every Apple ID for a particular person or entity based on email, birthdate, phone
4 number, payment method, or other information a person or entity provides for an Apple ID. Apple
5 likewise cannot determine how many Apple IDs any particular person or entity has, and, for the same
6 reasons, cannot calculate any “average” number of Apple IDs for a person or entity or across Apple
7 IDs.

8 6. To sign into the App Store, a person or entity need only provide an Apple ID and
9 password. One Apple ID may be used by multiple people or entities if, for example, a person or entity
10 shares their Apple ID and password with another—like a family member. Apple cannot determine the
11 number of people or entities sharing an Apple ID. A given Apple ID also may be used to sign into the
12 App Store on multiple devices—for example, an iPhone and an iPad—by different people or entities
13 sharing an Apple ID.

14 7. Attached as **Exhibit 1** is a true and correct copy of the purchase history as of July 1,
15 2020 for the Apple ID “macnod@gmail.com,” which the user associated with the name “Donald
16 Cameron.” Apple located this purchase history using the Apple ID, and then downloaded and saved
17 the information as a .pdf file on July 1, 2020. Records of purchases made by specific Apple IDs are
18 made at or near the time of such purchases and kept in the ordinary course of Apple’s business.

19 I declare under penalty of perjury under the laws of the United States of America that the
20 foregoing is true and correct.

21 Executed on August 10, 2021 at Cupertino, California.



22
23
24
25 By: _____

26 Mark Rollins
27
28

EXHIBIT 1

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